

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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In re QIWI plc Securities Litigation : Case No. 1:20-cv-06054-RPK-CLP
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This Document Relates To: : **ECF Case**
: **Electronically Filed**
ALL ACTIONS. : **Oral Argument Requested**
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**STIPULATION AND [PROPOSED] ORDER REGARDING TIME FOR DEFENDANTS
BORIS KIM AND SERGEY SOLONIN TO RESPOND TO COMPLAINT**

WHEREAS, on July 9, 2021, Lead Plaintiff Moset International Limited (“Plaintiff”) filed the Consolidated Amended Class Action Complaint for Violations of the Federal Securities Laws (ECF No. 30, the “Amended Complaint”) naming, among others, Defendants Boris Kim and Sergey Solonin (“Kim and Solonin”);

WHEREAS, on September 17, 2021, Defendants QIWI plc and Andrey Protopopov (together, the “Moving Defendants”) served a motion to dismiss the Amended Complaint (the “Outstanding Motion to Dismiss”);

WHEREAS, on October 12, 2021, counsel for the Moving Defendants confirmed that they will also be representing Kim and Solonin in this action.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, that:

1. Kim and Solonin agree to accept service of the Amended Complaint, while expressly reserving all rights and defenses except with respect to the sufficiency of process or the sufficiency of service of process as to the Amended Complaint.
2. Kim and Solonin’s time to respond to the Amended Complaint, if any, shall be extended until 30 days after the Court rules on the Outstanding Motion to Dismiss;

3. Kim and Solonin otherwise retain—and do not waive—all other defenses and objections to this action, including without limitation those related to personal jurisdiction and extraterritorial application of the United States securities laws; and

4. Following the Court’s decision on the Outstanding Motion to Dismiss, Plaintiff’s counsel and counsel for Kim and Solonin shall meet and confer on a proposed briefing schedule for any potential motion(s) to dismiss by Kim and Solonin.

DATED: November 10, 2021

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Counsel for Boris Kim and Sergey Solonin

IT IS SO ORDERED.

Dated: _____, 2021

HONORABLE RACHEL P. KOVNER
UNITED STATES DISTRICT JUDGE